

## UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TIMOTHY J. KING

08CR 655

CRIMINAL COMPLAINT  
MAGISTRATE JUDGE BROWN  
CASE NUMBER:

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 8, 2008, in Chicago Illinois, Cook County, in the Northern District of Illinois, defendant did:

threaten to murder two Federal law enforcement officers, namely, Individual A and Individual B, both of whom were employees of the United States authorized by law and by a Government agency to engage in and supervise the prevention, detection, investigation, and prosecution of any violation of Federal criminal law,

in violation of Title 18, United States Code, Section 115.

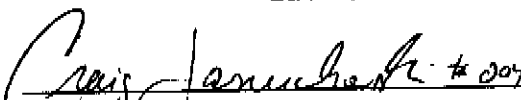
I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

See attached affidavit of Special Agent Craig Januchowski

Continued on the attached sheet and made a part hereof. ☒ Yes ☐ No

FILED

AUG 18 2008 TC

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT  
Signature of Complainant

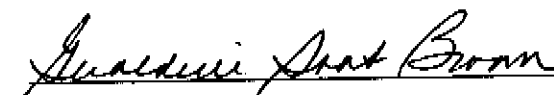
Sworn to before me and subscribed in my presence,

August 18, 2008  
Date

at

Chicago, Illinois  
City and State

Hon. Geraldine Soat Brown, U.S. Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

STATE OF ILLINOIS )  
 )  
COUNTY OF COOK )

AFFIDAVIT

I, Craig A. Januchowski, being duly sworn under oath, state as follows:

1. I am a Cook County Sheriff's Police Officer and have been so employed since January 2000. I am currently assigned to the Violent Crimes Squad of the Federal Bureau of Investigation (FBI) as a Task Force Officer. My responsibilities include the investigation of various violent crimes, including bank robberies, kidnappings, and other violent crimes.

2. I make this affidavit from personal knowledge based on my participation in this investigation and communications with others who have personal knowledge of the events and circumstances described herein. The information set forth below is provided for the limited purpose of establishing probable cause in support of the issuance of a Criminal Complaint and Warrant for Arrest for Timothy J. King, and does not contain all details or facts of which I am aware relating to this investigation.

3. From July 2, 2008 through August 11, 2008, the FBI received, from King: (1) at least thirteen complaints and communications via telephone; (2) approximately 175 e-mail messages; and (3) one "walk-in" complaint at the FBI Chicago Office that involved King speaking directly to an FBI Special Agent. The subject matter of King's communications generally involved an allegation that the FBI had contributed to the murder of a woman by a Chicago street gang.

4. On August 7, 2008, at approximately 1:00 a.m., King contacted the FBI Chicago Office via telephone and spoke with an FBI Special Agent. King stated, among other things, that he was going to deliver a letter to Individual A and King threatened physical violence against Individual B. Individual A and Individual B are Federal law enforcement officers as that term is defined in Title 18, United States Code, Section 115(c)(1). Specifically, Individual A is an employee of one United States law enforcement office and Individual B is an employee of another United States law enforcement office. Both Individuals A and B are authorized by law and by their Government agency to engage in and supervise the prevention,

detection, investigation and prosecution of any violation of Federal criminal law.

5. On August 7, 2008 at approximately 9:30 a.m., King arrived at the FBI Chicago Office, for the purpose of filing a complaint. King met with an FBI Special Agent while at the FBI office. King presented the agent with an Illinois State Identification Card that had been cut in half and taped back together. The agent informed King that the card had to be confiscated because King had separated the photo from the identifying information. During the meeting, King claimed, among other things, that Individual B and another person were in with a Chicago street gang, which King identified by name, and that Individual B had given up a woman, named by King, to the street gang to be executed. King stated that he would see Individual B in federal court soon and that Individual B would answer for this. Later King stated that the street gang, which King named, was responsible for the woman's death and that Individual B would pay for it. King told the Special Agent that the agent was not interested in the truth and then leaned forward and stated to the agent words to the effect of "How about you and I go down to Humboldt Park tonight, and we'll see who comes out alive?" King was then escorted off the FBI property. Later that day, at approximately 4:30 p.m., King spoke by telephone with the same FBI Special Agent who had met with King in person that morning. King complained that the agent had taken his identification card that morning and requested its return. King became irate and the Special Agent terminated the call.

6. The Illinois State Identification Card presented by King to the Special Agent on August 7, 2008 contained King's name, photograph, and other identifying information.

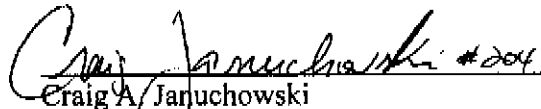
7. On August 8, 2008, at approximately 8:50 a.m. and again at approximately 8:54 a.m., King twice contacted the FBI Chicago Office via telephone to lodge a complaint. King spoke with an FBI analyst during both calls. King called from the same telephone number used during the August 7, 2008, 1:00 a.m. telephone call. King stated, among other things, that he was going to come to the FBI Chicago Office to retrieve his identification card.

8. On August 8, 2008, at approximately 9:30 a.m., King contacted the FBI Chicago Office via telephone and spoke with the same FBI analyst who had taken his calls earlier that morning. King

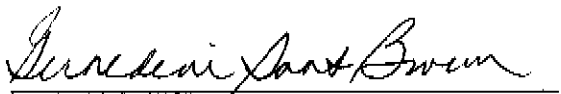
identified himself by spelling his name and providing the phone number from which he was calling. The phone number King provided was the same phone number used during the above-described phone calls. King stated, among other things, that he was tired of not being connected with Individual B and that he was getting nowhere with Individual A. King stated that he was tired of no one taking him seriously and that he had no other choice but to fly to Washington and "talk" to President Bush. King stated in substance: "Well, when I kill [Individual A] and I kill [Individual B], then someone at Washington will have to listen." King identified both Individual A and Individual B by name, and specifically used the word "kill" in reference to them.

9. On August 11, 2008, at approximately 9:07 a.m., King contacted the FBI Chicago Office via telephone. King complained that Individual A and Individual B were directly responsible for tapping his telephone line.

10. On August 11, 2008, at approximately 12:45 p.m., officers of the FBI Chicago Violent Crimes Squad went to the location where King was believed to be staying and approached King as he was entering his personal vehicle. Affiant recognized King from the image on his Illinois State Identification Card. Affiant and another officer identified themselves as FBI agents to King. King identified himself as Timothy King. King admitted that he had made telephone calls to the FBI over the last several days but denied making threats against Individuals A and B.

  
 Craig A. Jaruchowski  
 Task Force Officer  
 Federal Bureau of Investigation

Subscribed to and sworn before  
 me this 18th day of August, 2008

  
 U.S. Magistrate Judge Geraldine Soat Brown